

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

*Plaintiff,*

v.

Hangzhou Hibaby Technology Co., Ltd., and  
Hibobi Technology Limited

*Defendants.*

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**DECLARATION OF ZHIXIONG (OWEN) LIU**

I, Zhixiong (Owen) Liu, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

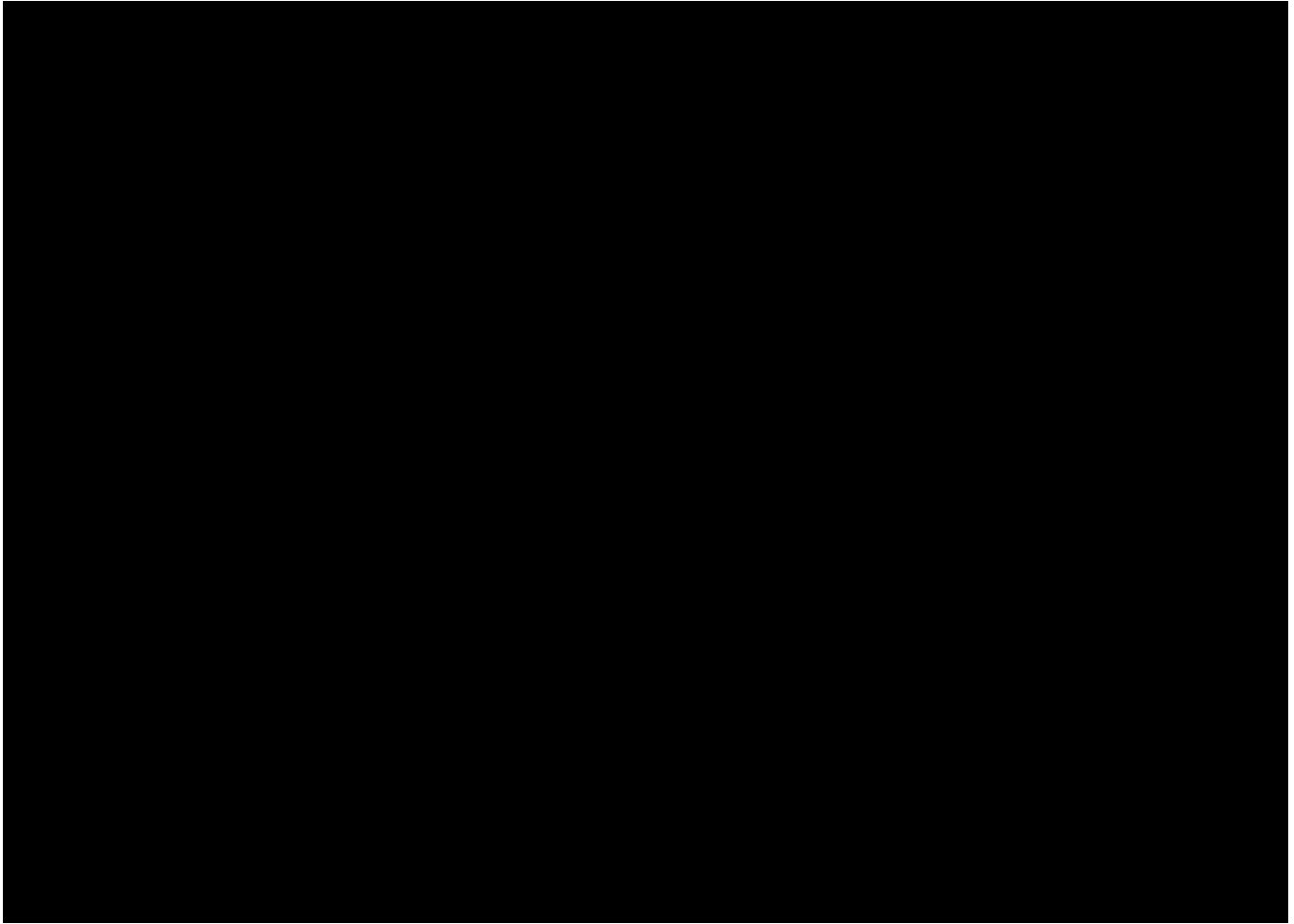
2. I am a co-founder of Hangzhou Haibaobei Technology Co., Ltd., Hangzhou Hibao Technology Co., Ltd., and Hibobi Technology Limited (“Hibobi”). My title is Vice President, Chief Marketing Officer. My responsibilities include supervising worldwide online marketing strategies of Hibobi’s e-Commerce platforms.

3. I reviewed the Schedule A attached to Plaintiff’s complaint. The name “Hangzhou Hibaby Technology Co., Ltd.” listed in Plaintiff’s Schedule A is not an official name of Hangzhou Haibaobei Technology Co., Ltd., Hangzhou Hibao Technology Co., Ltd., and Hibobi Technology Limited (“Hibobi”).

**I. ORGANIZATION**

4. Hibobi is an e-Commerce platform for parent-child fashion products. Hibobi was formed in 2019.

5. [REDACTED]



6. The mainland China address and telephone of Hibobi is below:

**Mainland China:**

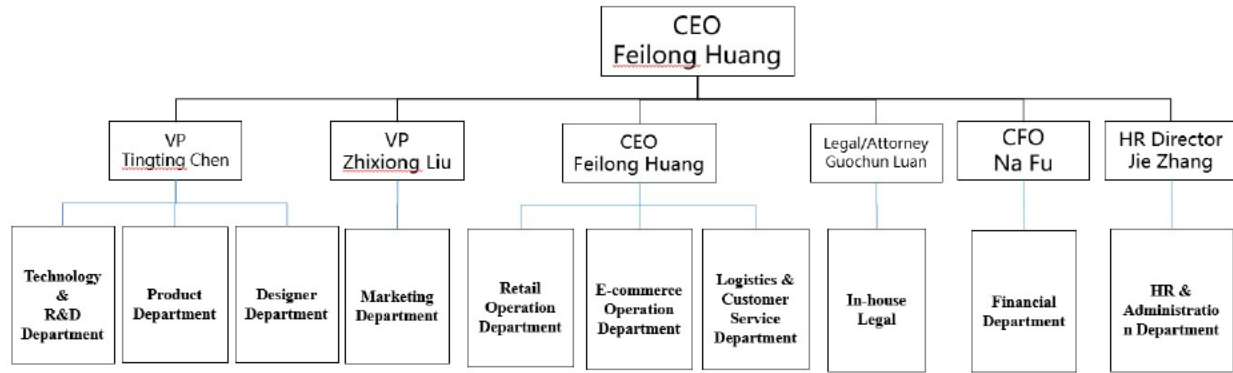
Floor 13, Block C, Overseas Building,  
8-10 Jiuhe Road,  
Hangzhou, Zhejiang Province

Telephone: +86-0571-87708991

(Address in Mandarin: 浙江省杭州九和路 8-10 号华侨国际 C 栋 13 楼)

7. Attached as Exhibit A is true and accurate information regarding Hibobi's Hong Kong entity (Hibobi Technology Limited). Such information is publicly available.

8. Below is a true and accurate description of Hibobi's corporation structure.



9. Below are the true and accurate email addresses of Hibobi's management:

Feilong Huang:	feilong.huang@hibobi.com
Tingting Chen:	tingting.chen@hibobi.com
Zhixiong Liu:	owen@hibobi.com
Na Fu:	na.fu@hibobi.com
Jie Zhang:	jie.zhang@hibobi.com
Guochun Luan:	guochun.luan@hibobi.com

## II. OPERATION

10. Hibobi works with the world top intellectual property owners, including [REDACTED], and fashion designers to create fashion designs that fit baby's body, paying attention to the details and craftsmanship, giving children and mothers the softest touch and the most comfortable experience.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14. Hibobi also works with fashion cloths suppliers and factories and serves as their e-Commerce platform. These factories provide designs to Hibobi for uploading on Hibobi's e-Commerce platform.

### III. SALES

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18. Attached as Exhibit F is a true and accurate summary of Hibobi's worldwide and US sales history in 2021.

#### IV. PAYMENT INFORMATION

19. [REDACTED]

20. Attached as Exhibit G is a true and accurate copy of Hibobi's [REDACTED] information as of October 21, 2022. The first page shows the account name, and the second page shows the sales data analysis in 2022. Hibobi's [REDACTED]

21. Attached as Exhibit H is a true and accurate copy of Hibobi's [REDACTED] information as of October 21, 2022. Hibobi's [REDACTED]

#### V. ACCUSED PRODUCTS AND PICTURES

22. Attached as Exhibit I is a summary of the true and accurate information regarding the accused products and pictures on Hibobi's website identified by Mr. Robert Rosenblum. Such information includes the source and suppliers of the products, the total U.S. sales of each accused products; and the date of removal of each product.

23. The total U.S. sale of the accused products is [REDACTED]

24. To date, all accused products and images identified by Mr. Robert Rosenblum have been removed from the Hibobi's platform.

25. Attached as Exhibit J are true and accurate excerpts of Hibobi platform's frontend, backend systems, and summaries showing the date and time (China Standard Time) when each accused product was removed from Hibobi's listing.

**VI. ASSET FREEZE**



I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 21, 2022, in Hangzhou, Zhejiang, China.

*Zhixiong . Liu .*

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Zhixiong (Owen) Liu